	O STATES DISTRICT COURT	
FOR THE SOUT	THERN DISTRICT OF ILLINOI	_
UNITED STATES OF AMERICA,	)	OCT 1 9 2017
Plaintiff,	) )	CLERK, U.S. DISTRICT COMMON SOUTHERN DISTRICT OF SOUTHERN DISTRICT OF SOUTHERN DEFINE
vs.	) Case No. 17-CR-30	154-SMY
LYNNE JONES,	)	
Defendant.	)	

## **STIPULATION OF FACTS**

Comes now Donald S. Boyce, United States Attorney for the Southern District of Illinois through Norman R. Smith, Assistant U.S. Attorney for this District and herewith enter into the following Stipulation of Facts with the defendant, Lynne Jones, represented by her attorney Justin Kuehn, pertaining to the relevant conduct of the defendant within the scope of U.S.S.G. §1B1.3.

- 1. From on or about August 7, 2010 through on or about May 1, 2015, in St. Clair County, within the Southern District of Illinois, LYNNE JONES did knowingly and willfully convert to her own use, without authority, money and property of the United States, Veteran's Administration survivor death benefits in the amount of \$62,685.
- Betty Guthrie received VA benefits of \$1130/month based on her deceased 2. husband's military service. Records indicate she passed away 8/7/2010.
  - 3. LYNNE JONES was the power of attorney for Betty Guthrie.
- 4. On April 9, 2015, LYNNE JONES was interviewed by an agent with the Department of Veteran's Affairs, Office of Inspector General, Criminal Investigations Division and she admitted to writing herself checks monthly from her deceased mother's account that was

receiving the Veteran's Administration survivor death benefits and to signing her deceased mother's name on the checks.

5. On May 1, 2015, the Veteran's Administration terminated the benefits and determined the loss amount to be \$62,685.

SO STIPULATED:

DONALD S. BOYCE United States Attorney

MNEVONES NORMAN R. SMITH
fendant Assistant United States Attorney

IUSTIN KUEHN
Actorney for Defendant

Date:  $\log \log (201)$  Date:  $\log \log (201)$